



August 31, 2022

FROM: Bruce A. Ring, Jr.
Director of Investments

RE: 2021 Annual Program Review

Section 166.450 of the Revised Statutes of Missouri requires the Director of Investments of the State Treasurer's office to annually review the Missouri MOST 529 Education Program ("MOST") and report those findings to the MOST Board ("Board"). The director must review five areas:

- Board administration
- Financial status
- Investment policy
- Participation rate
- Continued viability

Accordingly, I am pleased to report the following from my review for calendar year 2021.

I. Board Administration

Ascensus Government Savings Recordkeeping Services, LLC serves as MOST's program manager, record-keeper, distributor and servicing agent. Together with its affiliates, Ascensus Government Savings has overall responsibility for the day-to-day operations of the plan. Ascensus Government Savings assumed responsibility as recordkeeping and servicing agent, for both the Direct and Advisor Plans on June 3, 2006. On February 7, 2011, the Board entered into another contract with Ascensus Government Savings extending through June of 2016. Another RFP for program management services was issued in 2015. On February 8, 2016, a new contract was entered into with Ascensus Government Savings extending the contract service period to June of 2021, under the terms of the 2016 contract the Advisor Plan was eliminated and the participants were migrated into the Direct Plan. In addition, the Board met quarterly during 2021, as required by law.

In June of 2020, the Board entered into a new contract with Ascensus Government Savings extending the contract service period to June of 2026.

II. Financial Status

Following is a review of the financial status of our major partners and a summary of the investment performance of the investment options within the MOST plan.

A. Financial Status of MOST Partners

Ascensus Government Savings is part of Ascensus, Inc., the largest independent retirement and college savings services provider in the United States, helping over twelve million Americans save for the future. With more than 40 years of experience, the firm partners with financial institutions to offer tailored solutions that meet the needs of financial professionals, employers, and individuals. Ascensus specializes in recordkeeping, administrative, and program management services, supporting over 156,800 retirement plans and 6.3 million 529 college savings accounts. It also administers more than 1.6 million IRAs and 431,700 health savings accounts.

The investment manager for the Direct Plan, The Vanguard Group, Inc., remains a strong franchise. Vanguard is one of the world's largest investment companies, offering about 426 low-cost traditional funds and ETFs. As of June 30, 2021, more than 30 million+ investors have entrusted Vanguard with more than \$8 trillion in global assets under management. Vanguard continues to be a leader in the 529 plan industry, evidenced by over \$163 billion in 529 savings and pre-paid tuition plan assets under management. Headquartered in Malvern, Pennsylvania, Vanguard has about 17,300 employees spread across 19 locations worldwide.

B. Performance of MOST Underlying Funds

Overall, 2021 had a positive performance from two-thirds of the portfolio's and negative performance from the other 4 portfolio's., both fixed income and equity showed improvement from the prior year. Equity portfolios showed results ranging from +8.68% to +30.61%, while the fixed income results ranged from -2.19% to +5.32%. The results show worse performance in most fixed income portfolio's and better performance from equities compared to the prior year. Overall it was a decent year from an investment perspective.

In 2021, the returns on the plan portfolio's ranged from a -2.39% to 30.42%. Three plan portfolio's had negative returns while the other eighteen were positive.

Treasurer Fitzpatrick's office is responsible for monitoring the relative performance of each of the underlying investment alternatives versus an established benchmark. This effectively measures the contribution that the investment manager's expertise has on participants' returns. During calendar year 2021, both absolute returns and relative performance were positive with a couple exceptions. All of the underlying portfolios performed as expected or slightly below benchmark, with 1 of the DFA funds underperforming enough to warrant WATCH list status briefly during 2021. While index funds are expected to be at or slightly below benchmark, depending on the extent to which they stray from exact matching of the index, actively-managed funds are expected to exceed those benchmarks. All Watch List funds from 2021 have been removed from WATCH.

III. Investment Policy

In mid-2007, the Board adopted a formal investment policy governing program investment. The policy establishes objectives for structuring the investment options; formulates policies for selecting appropriate investment managers and the use of specific investment vehicles; and

establishes an investment-performance process for underlying funds in the Plan. The policy is an important statement by the Board in terms of defining its fiduciary responsibilities and standards for Treasurer Fitzpatrick's office staff and MOST partners.

Since its adoption, the policy has been amended twice. In 2008, the Board modified the policy to allow the Director of Investments, rather than the Board, to place a fund on, or release it from, the "WATCH" status.

In August 2011, the Board made several modifications to the policy. The Board lengthened a fund's formal review period—specifically, up three consecutive quarters from two—when looking at benchmark performance evaluation for the Watch List. When determining a fund's Watch List eligibility and quarterly performance, the Board also added "Beta" and "Alpha" measures to a review process. Finally, the Board eliminated the "value of active management" measurement criteria. In June 2016, a new Investment Policy was adopted by the Board when the Advisor Plan participants were merged into the Direct Plan and the Advisor Plan was eliminated.

In September 2019, a new version of the investment policy was adopted by the Fitzpatrick Administration, after review, with no substantive changes.

A review of the Policy has taken place in 2021 as required, there were no substantive changes made, only changes to marketing responsibilities for the program.

IV. Participation Rate

The following is an examination of the participation rate of the MOST programs. By examining the participation rate for the program, we can attempt to gauge the relative success the program has had in reaching the state's residents and encouraging them to increase 529 savings—the original goal of the IRS section authorizing these programs. The relative success or failure of states' various 529 programs rests on many different factors including the effectiveness of marketing efforts, availability of a state tax deduction, demographic and economic conditions, cost structure and the abilities, and resources of states' partners to attract and retain assets. However, one facet that has remained a constant is the competition for assets among states' program managers, which remains fierce.

A. Growth of Plan in 2021

The MOST Plan experienced growth in both accounts and assets during the year, despite the ongoing pandemic. Accounts in the plan grew by 3.82% in 2021, to 185,415 accounts, as compared to 172,900 in 2019 and 178,586 in 2020. The vast majority of accounts are Missouri residents which account for almost 90% of account ownership.

Plan assets grew by over 10.4% in 2021, as compared to 11.8% in 2020 and a 17% growth rate in 2019, ending the year at approximately \$4.2 billion as compared to calendar year 2020 at \$3.8 billion and year-end 2019 at \$3.4 billion. We are pleased to see that Missourians continued to invest in the Plan despite the ongoing uncertainty of the Covid environment.

It is notable that in April of 2021, the Plan reached \$4 Billion in assets under management for the first time! 2021 contributions outpaced withdrawals in the plan. Total contributions for 2021 were at \$409.3M, up about 42mm (11.46%) from 2020. Total withdrawals for 2021 were at \$405.8M, up \$57M from last year.

B. Comparison of MOST Participation to National Trends

Nationally, assets in 529 Plans on average have grown significantly over the past decade. However, last year the significant negative market action in December created an environment where most 529 Plans experienced a dip in assets under management (despite strong contributions last year). The Missouri's MOST Plan's 2020/21 results were consistent with its peers.

As of December, 2021, MOST assets increased by 10.44% over one year. This was attributable to the positive market environment during the year. When compared to our peer plan group, MOST has performed well over the past 5 periods showing a 10% compound growth rate, once again outperforming four of our six peer group members.

Nationally, assets in 529 Plans on average have grown significantly over the past decade. As indicated earlier, assets in the MOST program increased to \$4.2B as of December of 2021. This represented a 10.44% increase from assets in the plan from December of 2020.. The Missouri MOST Plan's 2021 asset growth results exceeded the national average of other Direct Plans (according to Strategic Insight Reporting, the average Direct Plan assets increased by 4.88% in 2021).

The MOST Plan continues to show strong organic growth. The plan added 16,478 new beneficiary accounts in 2021 (compared to 13,920 in 2020). This represents a 18.37% increase from last year.

V. Continued Viability

The MOST 529 Plan remains a viable 529 savings program. In Ascensus Government Savings' 15½-years of program management, we have experienced strong trends in asset and account growth despite the market turmoil that plagued much of this period. We also saw an upswing in the number of new beneficiaries enrolled in the plan, which shows growth of new customers.

Throughout the economic downturn and subsequent recovery, the Plan's performance has been resilient. The fact that participants weren't required to make non-qualified withdrawals on a large scale during this period is promising. As a result, the majority of participants should have experienced full recovery of their 529 savings account balances and some asset growth. The economic environment has been quite good for the past two or three years and should remain so for the coming months although fears of a recession have been surfacing.

In an effort to further strengthen our future performance, in 2018 the Board decided to restructure the glidepaths in the plan to provide a smoother transition through the years and lessen some of

the risks associated with transitioning from 1 age group to the next. The addition of DFA funds has enhanced our program offerings and should improve our overall plan.

Additionally, with the addition of K-12 participation in the plan, we saw a new significant driver of new accounts and withdrawals during the 2019 calendar year. This will most likely trend higher in future years as the availability of this option becomes more widely understood.

Missouri's MOST 529 Plan remains not only viable, but well positioned for growth as one of the premiere plans in the country.